



March 31, 2022

CSI Client Advisory 06-2022

SUBJECT: **UPDATE California Spill Management Team Regulations Implementation**

Update:

Pursuant to CSI Client Advisory 02-2022 (Dated Feb 2, 2022), we are providing you with this update regarding the California Spill Management Team (SMT) regulations. As mentioned earlier in reference to the acquisition of CSI by GMS, all SMT services are now combined under the single umbrella of GMS, therefore, all of your SMT requirements will be fulfilled by GMS.

Since the last advisory, GMS has participated in several virtual presentations hosted by the California Department of Fish and Wildlife's Office of Spill Prevention and Response (OSPR). These included training video conferences on 15 March for plan holders and 17 March for external SMTs both of which detailed the application process and enabled us to place inquiries with OSPR to ensure our team understood the extent of the requirement.

California's regulations for certification of SMTs will become effective April 1, 2022. To meet this requirement, we must Submit an SMT Application for Certification; Fulfill Training & Experience Requirements; Successfully Accomplish All Certification Exercise Objectives; and Demonstrate Ability to Meet On-Scene Requirements.

Submission of SMT Application: Regarding the required Plan Holder SMT application, we have met with OSPR and come to an agreement on a streamlined process that we will use for submitting applications on the plan holder's (your company) behalf. Therefore, you will not need to take any action. In the meantime, we will be updating your plans to list GMS as your SMT, which will ensure your coverage under this regime. The GMS Response Services (RS) Department is already prepared to complete the SMT application for certification. When the OSPR portal is online and open, the GMS RS team will be filing the application. Once this has been completed, OSPR will have up to 180 days to review it.

Fulfill Training & Experience Requirements: GMS has a cadre of personnel that meet the SMT requirements. All GMS SMT personnel must have a Statement of Qualifications (SOQ) and maintain it on the GMS Response Services Application (RSA). The RSA is a GMS-owned resource that exists as a secure cloud-based repository for GMS SMT SOQs. The RSA includes personal information, training, response experience, hours of each respective training session, and course certificates for each member. It also includes the status (available, not available) for each SMT member at any given time. Upon request from OSPR GMS will be able to provide evidence the GMS SMT meets the training & experience requirements.

Successfully Accomplish All Certification Exercise Objectives: As part of the certification process, SMTs must participate in a certification exercise after 01 April 2022 that simulates a spill or imminently threatened spill of a volume equal to or greater than a listed plan holder's largest reasonable worst-case discharge. We are excited to announce that GMS will be the first SMT to undergo this certification exercise under these new requirements. To meet this requirement, GMS will complete the certification exercise as part of the California Triennial Vessel Exercise (CalTriVEX) on 26 April 2022. Once complete, we will provide another update to report the status of our application and the successful completion of the exercise.



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Demonstrate Ability to Meet On-Scene Requirements: At an unannounced time of OSPR's choosing, SMTs will be contacted and required to provide evidence in the moment that the SMT personnel can arrive at a given location within the regulatory time requirements. GMS's SMT is postured to meet this requirement for any location within California.

Actions:

As previously noted, if you hold a California Contingency plan (C-plan), you will not need to take any action as GMS will achieve the required SMT certification to enable you to list our team in your plan enabling you to meet this requirement.

Important Dates/Timeframes:

- April 1, 2022: SMT regulations become effective.
- Beginning April 1, 2022: Owner/operators submitting NEW C-Plans for review must submit an Application for SMT Certification with their new C-Plan. GMS will take the necessary action to submit the application on your (plan holder) behalf.
- By June 30, 2022: Owner/operators with currently approved (existing) C-Plans must submit an Application for SMT Certification. GMS will take the necessary action to submit the application on your (plan holder) behalf.
- Within 180 calendar days after receipt of an application, OSPR will review and verify the application. If the application is evaluated as satisfactory, OSPR will issue an interim certification.
- By December 31 of the 3rd full calendar year from issuance of the interim certification the SMT must achieve full certification.

References: To view the SMT certification regulations-associated documents please visit the DFW OSPR websites listed in the below References:

- SMT Certification Rulemaking Documents: <https://wildlife.ca.gov/OSPR/Legal/Proposed-Regulations/SMT-Certification>
- California DFW OSPR SMT Website: <https://wildlife.ca.gov/OSPR/Spill-Management-Teams>
- Spill Management Team Certification Regulations FAQ – [Spill Management Team Certification FAQ](#)

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